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May 1, 1996

Ms. Sheri Bianchin
Remedial Project Manager, HSRL-6J
United States Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604

Dear Ms. Bianchin:

RE: First Draft, Technical Memorandum, Dewatering/Barrier Wall Alignment Investigation Report, American Chemical Services NPL Site, Griffith, Lake County, Indiana.

Staff of the Indiana Department of Environmental Management, Office of Environmental Response have reviewed the First Draft of the Technical Memorandum, Dewatering/Barrier Wall Alignment Investigation Report for the American Chemical Services Inc. NPL Site located in the town of Griffith, Lake County, Indiana. The following comments have been reviewed through a technical review of the document.

General Comments

[1] Contamination noted during the investigation activities, but not addressed with the dewatering/barrier wall system, must be addressed through the overall site remedy.

[2] According to the soil boring logs in Appendix B, SB216 indicated that there were two field analyses performed-one at 11-12 feet for PCBs and one at 13.5-15.5 feet for PCBs and VOCs. However, Table 2 does not list the 11-12 feet PCB sample. This should be included in the table. Also, when referencing Figure 2, SB205A was utilized for the barrier wall alignment but was not included in Table 2. Please revise accordingly.

[3] Not all samples presented in Appendix E have an IEA Assigned Number Index. Please provide this information for use in identifying what laboratory sample number corresponds to what SB sample.

[4] Please indicate if the results submitted from the confirmatory samples were reported in

dry or wet weight. This information is helpful when comparing the field results with the laboratory results.

[5] Please provide an explanation as to why the samples with the highest PID readings for SB109 (11-13'), SB114 (18.5-20.5') and SB127 (11-13') were not analyzed.

[6] Please explanation as to why some of the soil borings had only PCB or only VOC field analyses performed (ie. SB152, SB205). In addition, several discrete sample depths within the sample soil boring indicated having only PCB or only VOC analyses performed (ie. SB115 at 6-8'; SB123 at 6-8'; SB124 at 6-8' and 11-13'). It would seem logical that the sample location with the highest PID reading would be analyzed for PCBs and VOCs.

[7] SB223 at 18.5-20.5' had a PID reading of 51 meter units. However, there is no indication that field analysis was performed. Yet, when referring to Table 2, a field analysis result is listed. Please make the necessary corrections.

[8] When comparing the Field PCB results to the IEA Laboratory results, the field PCB results are higher than those of IEA Laboratory. PCBs are not easily lost in transit to the laboratory. Please provide an explanation for the difference in the results.

[9] In the Pre-Design Work Plan, 15 samples from the Still Bottoms/Treatment Lagoon Area and 11 samples from the Off-Site Containment Area, totaling 26 samples, were to be sent to IEA as confirmatory samples. This number was selected to represent 25% of the field analytical samples. It is understood that the number of soil borings and samples to be collected changed. However, the number for confirmatory samples is inadequate, especially for the VOCs, and does not fulfill the objectives set forth in the Pre-Design Work Plan and the Pre-Design QAPP.

[10] With the limited information provided regarding the QA/QC criteria utilized by the IEA Laboratory, it is difficult to determine if the proper protocols were followed.

<u>Specific Comments</u>

[11] Section 4.3, page 10, paragraph 5. This section discusses the waste refuse and associated void spaces that would limit the construction of a barrier wall in this location. This section also provides possible solutions to this challenge. In the possible solution it is suggested that a trench be excavated to the base of the refuse along the alignment location and backfill with imported material. Please provide additional information about the source and the integrity of this soil.

[12] Table 3. The rigid-wall permeability results provided for locations SB-206 and SB-151 are reversed, based upon the data provided in Appendix F. In addition, the "USCS" designation provided for SB-212 is not clear and is inconsistent with the data in Appendix F. These errors need to be corrected.

[13] Appendix E, SDG Narrative Volatile Fraction, page 1, paragraphs 1 and 4. Two different Environmental Protection Agency Statements of Work are mentioned as having been followed. The first (paragraph 1) references EPA 1/91 SOW, while the other (paragraph 4) discusses the purge and trap apparatus criteria in the SOW for OLM03.1. The most current revision of the EPA SOW for Organics and Inorganics is to be utilized throughout the project. A previous document evaluation of the QAPP has also addressed this issue. If any other revision has been used, the documentation may be deemed inappropriate for use.

[14] Appendix E, Chain of Custody, Collection of 3 Soil Boring Samples. The COC states that the analytical run is to meet CLP DQO Level 3. The Pre-Design Work Plan QAPP indicate that activities are not only meant for engineering design purposes but, also to determine extent, detect/monitor compliance, investigate wetlands and abandon wells. DQO Level 4 is required by the QAPP. If the associated data is to be used for any other purpose, it may be deemed unsatisfactory.

[15] Appendix E, Laboratory Reports for PCBs. The Pre-Design Work Plan QAPP indicates only IEA of Cary, North Carolina will perform the analyses of samples collected. Yet, several of the Organic Data Sheets indicate the reported results were faxed from a laboratory in Connecticut. If this is true, additional information about the laboratory is required for review so appropriate actions may be taken.

Staff would appreciate receiving a copy of the comments provided to the Respondents by the United States Environmental Protection Agency. If you have any questions or concerns, please feel free to contact me directly at 317/308-3116.

Sincerely,

Holly Grejda, Project Manager
Superfund Section
Office of Environmental Response

cc: K. Grindstaff, IDEM
F. Metcalfe, IDEM